

NATIONAL CAMPAIGN FOR SUSTAINABLE AGRICULTURE

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May 19, 2005

National Organic Standards Board
C/o Arthur Neal
Room 4008 – South Building
14th and Independence Avenue, SW
Washington, D.C. 20250-0001

Chair Jim Riddle and members of the Board:

Thank you for the opportunity to comment on the NOSB Recommendation for Guidance on Pasture Requirements for the National Organic Program. These comments represent my personal comments as Organic Policy Coordinator for the National Campaign.

The rationale for both this Pasture Guidance Recommendation and the NOSB Recommendations for Rule Changes (both “Stage of Production to Stage of Life” and “Access to Pasture”) proposed at the February/March NOSB meeting, was in part to respond to NOP’s request for clarification of the existing regulation regarding pasture. In light of that request, and in consideration of the fact that Rule changes may take significantly more time to be final than a Guidance, we suggest including the substance of both Rule changes as a part of this Guidance. The clarity offered by these Rule changes will help inform the substance of the Guidance prior to the final promulgation of the regulatory language.

The NOSB recommends a rule change to make the language in §205.239(a)(1), §205.239(b)(2) consistent with the language in §205.237(a)(2). The language, therefore in §205.239(a)(1) would read “Access to outdoors, shade, shelter, exercise areas, fresh air, and direct sunlight suitable to the species its stage of production-life, the climate, and the environment. §205.239(b)(2) would be amended to read “animal’s stage of production-life.”

The NOSB recommends that §205.239(a)(2) be amended to read:
§205.239(a)(2) ~~Access to pasture for ruminants~~ Ruminant animals grazing pasture during the growing season.

This includes all stages of life except:

a) birthing; b) dairy animals up to 6 months of age and c) beef animals during the final finishing stage, not to exceed 120 days.

Note: Lactation of dairy animals is not a stage of life under which animals may be denied pasture for grazing.

“Access to pasture” has been a cornerstone of consumer expectation for the management of organic livestock. For the general public, this expectation is based on a vision of what makes “happy cows,” as well as more developed assumptions as to concerns about environmental degradation caused by large-scale confinement operations and the advantage in nutritional value believed to be associated with pastured livestock products.

In any case, "access to pasture" is now a permanent part of the Organic Standards, and as noted by NOSB in clarifying recommendations in June 2000 and October 2001. I applaud both the Recommendation for Rule Change and the proposal for Guidance in further cementing this concept in to solid, useable standards.

In general, I support all three Guidances proposed by the NOSB.

The Organic System Plan clarification is in keeping with general definitions used to define grazing systems, and therefore provides a baseline recommendation. However, I support the proposal by others to also include language from the 2001 NOSB recommendation: "grazed feed must provide a significant portion of the total feed requirements." This sentence provides the basic principal in support of the specific prescribed goals.

The proposed change would read:

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. The Organic System Plan shall have the goal of providing grazed feed greater than 30% dry matter intake on a daily basis during the growing season but not less than 120 days. The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements.

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With regard to Temporary Confinement, I support the statement that that "[i]n no case shall temporary confinement be allowed as a continuous production system." This underlines the fact that there is no inherent right to use of the Organic Label, and that if a farm's land base is not generally capable of meeting the pasture standard laid out in the NOSB recommendation, it should not be certified as an organic livestock operation.

I support the Board's efforts to look towards objective measurements of local pasture conditions in their attempt to define Appropriate Pasture Conditions. I concur with the National Organic Coalition's correction to the proposed Recommendation in referencing the NRCS Prescribed Grazing Specification Guide (Code 528) as well as the Practice Standards.

Thank you for the opportunity to comment.

Sincerely,

Liana Hoodes, Organic Policy Coordinator